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COUNTY OF LOS ANGELES

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS, et
al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, et al,

Defendants.

No. 2:20-cv-02291 DOC-KES

Hon. David O. Carter

**DEFENDANT COUNTY OF LOS
ANGELES' REQUEST FOR
EMERGENCY STATUS
CONFERENCE**

1 Defendant County of Los Angeles, by and through its undersigned counsel, submits this
2 request for an emergency status conference with the Court.

3 As the Court is aware, the County of Los Angeles (“County”) and the City of Los Angeles
4 (“City”) are undertaking an unprecedented effort through Project Roomkey (a State of California
5 supported and FEMA-approved program) to secure hotel and motel rooms in local communities to
6 provide safe isolation capacity for vulnerable persons experiencing homelessness in order to protect
7 them and their neighbors from COVID-19 during this emergency.

8 The County's Office of Emergency Management is also establishing hotels and motels as
9 (i) isolation facilities for persons testing positive for or experiencing symptoms of COVID-19 and
10 (ii) quarantine facilities for persons who have been exposed to persons testing positive for or
11 experiencing symptoms of COVID-19. Persons are eligible for isolation and quarantine facilities if
12 they cannot safely self-isolate or quarantine at home, regardless of socio-economic status, but the
13 unsheltered are the most likely beneficiaries of this program.

14 These emergency measures are intended to protect the public health by isolating the medically
15 vulnerable in order to slow the rate of the spread of COVID-19 and flatten the curve. These programs
16 are temporary and part of the County response to the declared local, state, and federal emergencies in
17 response to the COVID-19 pandemic. Hotels and motels throughout the County and City are
18 participating in these programs. The County—working in partnership with other stakeholders and
19 over a dozen leasing agents from the State of California and private sector—has engaged with more
20 than 250 hotel/motel owners over the past weeks. These numbers continue to grow
21 Countywide. Currently, the County has contracts for hotel and motel beds with over 25 hotels for
22 a combined total of approximately 2,500 beds throughout the County. These beds are sited in cities
23 large and small in the Antelope Valley, the South Bay, the San Gabriel Valley, the San Fernando
24 Valley, and metropolitan Los Angeles. The County has enjoyed wide public support.

25 However, over the last few days the County’s efforts to house persons experiencing
26 homelessness have been stymied by objections from several cities in the County. For instance, as of
27 April 17, 2020, the County has received correspondence from the cities of Lawndale and Bell Gardens
28

1 threatening to interfere with the efforts of the County and participating hotels and/or motels to move
2 forward with the County's effort to secure housing for vulnerable persons experiencing homelessness.

3 First, the City of Bell Gardens has demanded that the County cease "intake and acceptance of
4 new patients immediately" and arrange "to transfer existing patients to other available facilities as
5 soon as possible" or else Bell Gardens "will be forced" to take actions detrimental to the hotel
6 currently participating in the County's quarantine and isolation program. *See Exhibit A* (City of Bell
7 Gardens Letter dated April 15, 2020).

8 Second, the City of Lawndale expressed that "while Project Roomkey is a well-intended
9 program to help the most vulnerable homeless in Los Angeles County during the COVID-19 global
10 pandemic," it believes "irreparable harm to the Lawndale community" will occur. The City of
11 Lawndale further warned that "the City will schedule a public hearing for the Planning Commission
12 to consider revoking the [hotel's Special Use Permit] to prevent this from occurring." *See Exhibit B*
13 (City of Lawndale Letter dated April 14, 2020).¹

14 It is very possible that more cities may delay or impede Project Roomkey and other programs
15 designed to secure hotel and motel rooms in local communities designated for the most vulnerable in
16 the County. Therefore, based on the above, the County believes that the Court's immediate
17 intervention is required. The Court can play a valuable role in the County's efforts to successfully
18 implement these programs. As such, the County respectfully requests the Court direct the attendance
19 at this emergency status hearing of the following individuals as the relevant decision-makers of cities
20 with documented concerns with Project Roomkey and other related programs:

- 21 • **City of Bell Gardens**: Alejandro Cortez (Mayor), Scott B. Fairfield (Chief of Police), and
22 Michael B. O'Kelly (City Manager); and
- 23 • **City of Lawndale**: Robert Pullen-Miles (Mayor), Duane Allen (Captain, Los Angeles County
24 Sheriff Department, South Los Angeles Station),² and Kevin M. Chun (City Manager).

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26
27 ¹ The County also was just informed today that the City of Lawndale has threatened to shut off
the power to the relevant hotel as of this Monday, April 20, 2020.

28 ² The County also recommends that the Court invite Los Angeles County Sheriff Alex Villaneuva
to attend this emergency status conference given his law enforcement role throughout the County
of Los Angeles. Captain Duane Allen also reports to Sheriff Villaneuva.

1 The County plans to collaborate with Bell Gardens and Lawndale in an attempt to assuage
 2 their concerns, as well as work with other cities in the County to ensure that rooms for isolation,
 3 quarantine, and vulnerable persons experiencing homelessness are made available. The County
 4 intends to work as a partner. However, protecting the public health is paramount. Time is of the
 5 essence.

6 As a result, the County requests that the Court set a hearing on this Emergency Request at the
 7 Court's earliest convenience.

9 Dated: April 17, 2020

MARY C. WICKHAM
 COUNTY COUNSEL

11 By: /s/ Lauren M. Black

12 Lauren M. Black
 13 Principal Deputy County Counsel
 Attorney for Defendant
 COUNTY OF LOS ANGELES

14 Dated: April 17, 2020

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16 By: /s/ Brandon D. Young

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